

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,

v.

SHANE CASEY,
Defendant.

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Docket No. 2:19-cr-00148

MOTION FOR DETENTION

The United States of America, by and through its attorney, Christina E. Nolan, United States Attorney for the District of Vermont, moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. This defendant is eligible for detention because the case involves an offense under the Controlled Substances Act for which a maximum term of imprisonment of ten years or more is prescribed. 18 U.S.C. § 3142(f)(1)(C).

2. Reason For Detention. The Court should detain the defendant because there are no conditions of release that will reasonably assure the safety of the community.

3. Rebuttable Presumption. Based on the defendant's October 24, 2019 indictment (Doc. No. 23), the United States invokes the rebuttable presumption against defendant under § 3142(e).

4. Other Matters. Casey has been charged with five counts of distributing methamphetamine. These are exceedingly serious charges involving a highly addictive and dangerous illegal drug. The evidence, including text messages and audio and video recordings of the transactions, is very strong. In terms of Casey's history and characteristics, Casey has a 2011 Vermont felony conviction for first degree aggravated assault and, based on law enforcement's investigation, appears to be an active drug user, including a methamphetamine user. In addition, Casey is facing Massachusetts state drug charges after a car stop on October 6, 2019 in

Shelburne Falls, Massachusetts. It appears Casey had methamphetamine on him and tried to destroy the evidence when confronted by Massachusetts police. Based on law enforcement's investigation, Casey has been involved with distributing significant quantities of methamphetamine in Chittenden County for at least the past six months. As stated earlier, methamphetamine is an exceedingly dangerous drug. As a user and distributor of methamphetamine, Casey poses a large risk to the safety of the community

The severity of the federal crimes for which Casey is charged, the other evidence of his involvement in illegal drug trafficking, and his apparent status as a methamphetamine user demonstrate that there is no set of conditions of release that will reasonably assure the safety of the community.

5. Time For Detention Hearing. The United States requests the court conduct the detention hearing after the pretrial services officer has had sufficient time to complete a bail report.

Dated at Burlington, in the District of Vermont, this 21st day of November, 2019.

Respectfully submitted,

UNITED STATES OF AMERICA

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